

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

IN RE: CURT CHARLES BUSCHING

**CASE NO. 09-03131-EE
CHAPTER 7**

**MOTION TO EXTEND DEADLINE
FOR FILING A § 523 AND/OR §727 COMPLAINT**

COMES NOW BankPlus, a creditor and party in interest in connection with the above-captioned bankruptcy case (the “Bankruptcy Case”) and files this Motion to Extend the Deadline for Filing a §523 and/or §727 Complaint (the “Motion”), as follows:

1. The current Bankruptcy Case deadline (“Deadline”) to file a complaint objecting to discharge of the Debtor or to determine dischargeability of certain debts (pursuant to 11 U.S.C. §523 and/or §727) is January 11, 2010. (Dkt. No. 7).

2. BankPlus requires additional time for investigation and review, and, as such, requests this Court to extend the Deadline until March 31, 2010. This proposed revised deadline is consistent with the revised deadline that has already been requested by the Chapter 7 Trustee (*see* Dkt. No. 22).

3. Counsel for Debtor has advised counsel for BankPlus that she will agree to BankPlus’ request to extend the Deadline. Accordingly, BankPlus expects to submit a proposed Agreed Order for the Court’s consideration shortly after filing the Motion.

WHEREFORE, PREMISES CONSIDERED, BankPlus prays this Court for an Order extending the Deadline to March 31, 2010. BankPlus further prays for general relief.

THIS the 4th day of January, 2010.

Respectfully submitted,

BANKPLUS

By: /s/ Danny E. Ruhl

William H. Leech, MSB No. 1175

Danny E. Ruhl, MSB No. 101576

Its Attorneys

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served, via the Court's ECF Notification System, a true and correct copy of the above and foregoing on:

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Chapter 7 Trustee

R. Michael Bolen, Esquire

U. S. Trustee

100 West Capitol St, Ste 706

Jackson, MS 39269

THIS the 4th day of January, 2010.

/s/ Danny E. Ruhl

Of Counsel